



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Research Triangle Park, NC 27711

OFFICE OF
 AIR QUALITY PLANNING AND
 STANDARDS

June 28, 2022

Mr. Michael Long
 Senior Director, Environmental Compliance Steel
 Cleveland-Cliffs, Inc.
 200 Public Square, Suite 3300
 Cleveland, Ohio 44114-2315
michael.long@clevelandcliffs.com

Dear Mr. Long:

Pursuant to section 114 of the Clean Air Act (CAA), 42 U.S.C. §7414(a), the U.S. Environmental Protection Agency (EPA) is collecting information related to hazardous air pollutant (HAP) emissions at coke manufacturing facilities. Cleveland Cliffs owns and operates emission sources at the following coke manufacturing facilities that are required to respond to the request for information listed in the table below.

Information Response Requirements for Cleveland Cliff Facilities

Owner	City/State	Enclosure 1 Survey Sections:	Enclosure 2 Testing Sources to be Tested Include: Coke By-Product Recovery Plant (CBRP) Stacks, Fugitives, Flares, By-Product Coke Oven Doors
Cleveland-Cliffs	Burns Harbor, IN	A, B, C, D, E	CBRP, Doors, Fugitives, Flares
Cleveland-Cliffs	Monessen, PA	A, B, C, D, E	Flares
Cleveland-Cliffs	Warren, OH	A, B, C, D, E	Flares

We are requesting information and data pertaining to these sources to update and expand the information requested in 2016 to support the EPA's residual risk and technology review being conducted pursuant to CAA section 112(f)(2) and 112(d)(6) of the National Air Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens: Pushing, Quenching, and Battery Stacks (subpart CCCCC) and the technology review being conducted pursuant to CAA section 112(d)(6) of the NESHAP for Coke Oven Batteries (subpart L). The EPA is also requesting data and related information both to inform the development of emissions standards for currently

unregulated HAP as required by recent judicial interpretation of the CAA (*Louisiana Environmental Action Network et al. v. EPA*, 955 F.3d 1088 (D.C. Cir. 2020)) and to inform potential revised or new emissions standards for co-located Coke Oven By-Product Recovery (Chemical) Plants.

Attached to this request are nine enclosures. There are two general components: a questionnaire component (**Enclosure 1**) and a testing and sampling component (**Enclosure 2**). These components are designed to collect information on emissions and other relevant aspects of coke manufacturing operations. **Enclosure 1** contains instructions for completing and submitting the questionnaire component. **Enclosure 2** contains instructions for the testing and sampling component. **Enclosures 3 through 9** provide supplemental information.

We have created answer tables for the information requested in **Enclosures 1 and 2**. Attached to this letter are the answer spreadsheets specific to each of the coke manufacturing facilities operated by your company as applicable to this CAA section 114 information request. From responses to EPA's 2016 Coke Manufacturing CAA section 114 information request, we have some information currently requested in **Enclosure 1**. Where available and appropriate, we have pre-populated those previously-submitted data into an answer spreadsheet and request that the previous data be reviewed for correctness. Any facility that did not provide information in 2016 must provide all information requested in **Enclosure 1**, as applicable to the facility and processes. We have not included answer files for test data requested in **Enclosure 2**, as that must instead be submitted with the EPA's Emissions Reporting Tool. (ERT)

Please note that emissions data provided under section 114 of the CAA are not entitled to confidential treatment under 40 C.F.R. Part 2.¹ If there is any information related to facility operations other than emissions data that you would like to claim as confidential business information (CBI), please follow the instructions in **Enclosures 1 and 5** to ensure appropriate handling and submission of your response. You are required to return all **Enclosure 1** associated responses and documents within **65 days (9 weeks)** after receipt of this request. See **Enclosure 2** for deadlines associated with the submittal of all items related to testing. Also note that our contractors or other authorized representatives discussed in **Enclosure 6** must follow the policies and procedures for handling trade secrets and CBI outlined in **Enclosure 5**, which ensure your rights and protect any privileged information you submit for this request.

Enclosure 7 provides guidance for developing a site-specific test plan. A site-specific test plan addresses the planning and quality assurance quality control procedures and acceptance criteria for all the testing, including the collection of process data. Please note that you must submit a test plan to the EPA for approval prior to testing as requested in **Enclosure 2**. For the test methods in **Enclosure 2** that are to be reported via the ERT, a test plan must be entered into the ERT program prior to submitting the test results. **Enclosure 8** provides an example of the EPA ERT test plan. **Enclosure 9** provides a certification statement for your certifying official to sign, date, and return with your submittal.

¹ For additional information on emission data, please see 40 C.F.R. §2.301 and Enclosure 3.

The table below summarizes the enclosures included with this request.

Enclosure #	Description
1	CAA section 114 request for information for coke manufacturing - questionnaire and submittal instructions
2	CAA section 114 request for information for coke manufacturing - testing procedures, methods, and reporting requirements
3	EPA's information gathering authority under section 114 of the CAA
4	Disclosure of emissions data claimed as confidential under sections 110 and 114(c) of the CAA
5	Summary of procedures for safeguarding CAA confidential business information
6	Designation of authorized representative for the EPA for NESHAP (CAA section 112)
7	Site specific test plan development guidance
8	Example ERT version 6 test plan
9	Certification statement

This CAA section 114 request for information is one step in an established public process for collecting foundational information as part of our NESHAP reviews required by the CAA. The public and stakeholders will continue to have opportunities to comment on EPA's Coke Manufacturing NESHAP rules, including a formal notice-and-comment period on any proposed action. CAA section 114(a) authorizes the EPA Administrator to require the submission of information, including information from an owner or operator of an emission source for the purpose of developing or assisting in the development of NESHAP under CAA section 112. This authority has been delegated to the Director of the Sector Policies and Programs Division in the U.S. EPA Office of Air and Radiation, Office of Air Quality Planning and Standards.

Thank you for your assistance in this effort. Your response will provide comprehensive information about the Coke Manufacturing source category, which will lead to a more effective rulemaking. If you have questions regarding this questionnaire, please contact Dr. Donna Lee Jones in EPA's Sector Policies and Programs Division at jones.donnalee@epa.gov.

Sincerely,

Penny Lassiter
Director
Sector Policies and Programs Division

Enclosures (9)

cc: Mr. Matthew Stuckey
Assistant Commissioner
Office of Air Quality, Indiana Department of Environmental Management

Mr. Mark Hammond
Director
Bureau of Air Quality, Pennsylvania Department of Environmental Protection

Mr. Bob Hodanbosi
Director
Division of Air Pollution Control, Ohio EPA

Ms. Cristina Fernandez
Director
Air and Radiation Division, U.S. EPA Region 3

Mr. John Mooney
Director
Air and Radiation Division, U.S. EPA Region 5

Mr. David Ailor
President
Coke Oven Environmental Task Force

Mr. Chuck French
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Metals and Inorganic Chemicals Group
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Dr. Donna Lee Jones
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